

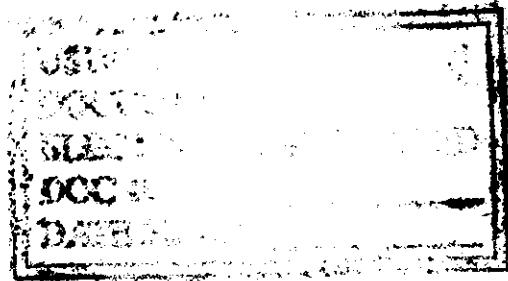
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
- - - - - X

ORIGINAL

UNITED STATES OF AMERICA :
- v. - :
ROBERT LIM, MARK PJETRI, :
RANA PALMERE, JULIO VELASQUEZ, :
RAUL GONZALEZ, and :
JOSEPH SACKS, :
Defendants. :
- - - - - X

INDICTMENT

08 Cr. 65



COUNT ONE

The Grand Jury charges:

1. From at least in or about September 2005 through on or about November 29, 2007, in the Southern District of New York and elsewhere, ROBERT LIM, MARK PJETRI, RANA PALMERE, JULIO VELASQUEZ, RAUL GONZALEZ, and JOSEPH SACKS, the defendants, and others known and unknown, unlawfully, intentionally and knowingly, did combine, conspire, confederate and agree together and with each other to violate the controlled substances laws of the United States.

2. It was a part and object of the conspiracy that ROBERT LIM, MARK PJETRI, RANA PALMERE, JULIO VELASQUEZ, RAUL GONZALEZ, and JOSEPH SACKS, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly, did distribute and possess with intent to distribute a controlled substance, to wit, 1000 kilograms and more of a mixture and substance containing a detectable amount of marijuana, in violation of Title 21, United

States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal objects thereof, ROBERT LIM, MARK PJETRI, RANA PALMERE, JULIO VELASQUEZ, RAUL GONZALEZ, and JOSEPH SACKS, the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about September 28, 2007, MARK PJETRI and JULIO VELASQUEZ traveled to the vicinity of 67 Elissa Lane in Yonkers, New York.

b. On or about October 4, 2007, RANA PALMERE and JOSEPH SACKS traveled to the vicinity of 67 Elissa Lane in Yonkers, New York.

c. On or about October 19, 2007, RAUL GONZALEZ possessed marijuana in Westchester County, New York.

d. On or about October 19, 2007, ROBERT LIM traveled to the vicinity of 67 Elissa Lane in Yonkers, New York.

(Title 21, United States Code, Section 846)

Forfeiture Allegation

4. As a result of committing the controlled substance offense alleged in Count One of this Indictment, ROBERT LIM, MARK PJETRI, RANA PALMERE, JULIO VELASQUEZ, RAUL GONZALEZ, and JOSEPH SACKS, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. Section 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or

indirectly as a result of the said controlled substances violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the controlled substances violations alleged in Count One of this Indictment.

Substitute Asset Provision

a. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third person;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)

Jayne R. Greco
FOREPERSON

Michael J. Garcia
MICHAEL J. GARCIA
United States Attorney